

Molly S. Considine Bar No. 13800

**PATTEN, PETERMAN, BEKKEDAHL & GREEN, P.L.L.C.**

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*Attorneys for Debtors*

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MONTANA

<p>IN RE:</p> <p>DEREK LYNN SANDE,</p> <p>Debtor,</p> <p>SANDE FARMS, LLC,</p> <p>Debtor,</p> <p>GARY A. SANDE and EVELYN L. SANDE,</p> <p>Debtor.</p>	<p>Case No. 2:19-bk-61079-BPH</p> <p>Substantively consolidated with:</p> <p>Case No. 2:19-bk-60962-BPH</p> <p>Jointly administered with:</p> <p>Case No. 4:21-bk-40039-BPH</p> <p><b>STIPULATION BETWEEN DEBTOR'S COUNSEL AND CHAPTER 12 TRUSTEE</b></p>
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Molly S. Considine, of Patten, Peterman, Bekkedahl & Green, PLLC (“Debtor’s Counsel”), and Joseph Womack, Chapter 12 Trustee (“Chapter 12 Trustee”), stipulate and agree as follows:

1. Debtor's Counsel filed a spreadsheet showing the pending fee applications at ECF No. 428.

3. Debtor's Counsel and the Chapter 12 Trustees have resolved their issues related to the plan payments paid by the applicable debtors directly to the individuals identified in the spreadsheet. Stipulations will be filed in each applicable case.

4. The Chapter 12 Trustees shall be paid their applicable fees identified in the spreadsheet on the next scheduled plan payment in each applicable case.

5. Debtor's Counsel and the Chapter 12 Trustees will not file employment applications or request court approval for the applicable debtor's payment of fees and costs to accountants and attorneys that provided services to the debtor that were not central to the administration of debtor's bankruptcy.

6. Upon approval of this Stipulation, Debtor's counsel shall send a notice to each of the affected debtor's instructing them to pay the accountants and/or attorney directly, as identified in the spreadsheet, and provide notice that the next scheduled plan payment shall increase by the amounts reflected in the spreadsheet to "catch-up" the outstanding trustee's fees.

7. The Court may allow future reasonable compensation to the Debtors' attorney for representing the interests of the Debtors in connection with the bankruptcy case based on consideration of the benefit and necessity of the services to the Debtors under paragraph 2(a) of the Debtors' confirmed plan.

WHEREFORE, based on the foregoing, Debtor's Counsel and the Chapter 12 Trustee respectfully request that the Court approve this Stipulation and provide that the parties are henceforth bound by its terms.

SO STIPULATED this 21st day of March, 2024.

CHAPTER 12 TRUSTEE

By: /s/Joseph V. Womack

Joseph Womack,  
Chapter 12 Trustee

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By: /s/Molly S. Considine

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